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10 Attorneys for Defendants
11 ALLEN CRUMPLER, d/b/a ACE
12 DEMOLITION and TRAVELERS PROPERTY
13 CASUALTY COMPANY OF AMERICA

14
15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 JUAN M. SANCHEZ, an individual,

18 CASE NO. 2:18-cv-00023-MMD-PAL

19 Plaintiff,

vs.

20 ALLEN CRUMPLER, d/b/a ACE
21 DEMOLITION; TRAVELERS PROPERTY
22 CASUALTY COMPANY OF AMERICA, a
23 Connecticut corporation; DOES I-X; and ROE
24 CORPORATIONS, I-X, inclusive,

25 Defendants.

26
27 **STIPULATION AND [PROPOSED]
28 ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO REMAND**

[First Request]

29 Pursuant to Local Rule 7-1, Plaintiff JUAN M. SANCHEZ ("Plaintiff") and Defendants
30 ALLEN CRUMPLER, d/b/a ACE DEMOLITION and TRAVELERS PROPERTY CASUALTY
31 COMPANY OF AMERICA ("Defendants"), by and through their respective counsel of record,
32 hereby file this stipulation to extend the time for Defendants to file their response to Plaintiff's
33 Motion to Remand (ECF No. 7). Plaintiff's Motion to Remand (ECF No. 7) was filed and served
34 electronically on January 9, 2018. Pursuant to Local Rule 7-2(b), the current deadline for
35 Defendants to file and serve points and authorities in response to Plaintiff's Motion to Remand is
36 14 days from the date of service, or January 23, 2018.
37

1 A brief extension of 14 days to file a response, or up to and including **February 6, 2018**, is
2 necessary because Defendants are in the process of determining if separate counsel will be
3 necessary and the brief extension will allow sufficient time to evaluate possible conflict issues and
4 also for separate counsel to be retained and get up to speed if it is determined that having separate
5 counsel is appropriate. This is the Parties' first request for an extension and the Parties agree and
6 represent that the requested extension is sought in good faith and not for purposes of unnecessary
7 delay.

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9 Dated: January 17, 2018

10 LEWIS BRISBOIS BISGAARD & SMITH LLP

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12 BRUCE C. YOUNG, ESQ.
13 SCOTT H. BARBAG, ESQ.

14 Attorneys for Defendants
15 Allen Crumpler, d/b/a Ace Demolition
and Travelers Property Casualty Company
of America

Dated: January 17, 2018

THE COTTLE FIRM

/s/ Matthew Minucci

ROBERT W. COTTLE, ESQ.
MATTHEW D. MINUCCI, ESQ.

Attorneys for Plaintiff
Juan M. Sanchez

17
18 **ORDER**
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20 IT IS SO ORDERED.

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23 UNITED STATES DISTRICT JUDGE
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26 DATED: January 17, 2018
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